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UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X		
TAMARINDART, LLC,	:	
	:	
Plaintiff,	:	07 CV 6296 (JSR)
	:	
-against-	:	
	:	<b>ANSWER</b>
TAMARIND GROVE LLC, LAKSHMI PRATURY,	:	
SHYAMOLI BANERJEE and ANU SETHURAM,	:	<b>JURY TRIAL</b>
	:	<b>DEMANDED</b>
Defendants.	:	
-----X		

Defendants Tamarind Grove LLC (“Tamarind Grove”), Lakshmi Pratury, Shyamoli Banerjee and Anu Sethuram (together “Defendants”) by their attorneys, Friedberg Cohen Coleman & Pinkas, LLP, as and for their Answer to the complaint (the “Complaint”) served by plaintiff TamarindArt, LLC (“Plaintiff” or “TamarindArt”) state and allege on knowledge as to their own acts and information and belief as to the acts of others as follows:

1. Deny knowledge or information sufficient to respond to the allegations contained in paragraph 1 of the Complaint.
2. Admit the allegations contained in paragraph 2 of the Complaint.
3. Admit the allegations contained in paragraph 3 of the Complaint.
4. Deny the allegations contained in paragraph 4 of the Complaint except admit that Ms. Banerjee is an individual.

5. Deny the allegations contained in paragraph 5 of the Complaint except admit that Ms. Sethuram is an individual.

6. Decline to respond to the allegations contained in paragraph 6 of the Complaint as no responsive pleading is required.

7. Deny the allegations contained in paragraph 7 of the Complaint.

8. Deny the allegations contained in paragraph 8 of the Complaint.

9. Deny knowledge or information sufficient to respond to the allegations contained in paragraph 9 of the Complaint.

10. Deny knowledge or information sufficient to respond to the allegations contained in paragraph 10 of the Complaint.

11. Deny the allegations contained in paragraph 11 of the Complaint.

12. Admit the allegations contained in paragraph 12 of the Complaint.

13. Deny the allegations contained in paragraph 13 of the Complaint.

14. Deny the allegations contained in paragraph 14 of the Complaint.

15. Deny the allegations contained in paragraph 15 of the Complaint.

16. Deny the allegations contained in paragraph 16 of the Complaint except admit that the activities of defendant Tamarind Grove are directed and controlled by defendant Lakshmi Pratury.

17. Deny the allegations contained in paragraph 17 of the Complaint except admit that defendant Lakshmi Pratury has from time to time visited this district and has promoted the activities of defendant Tamarind Grove in the course of such visits.

18. Deny the allegations contained in paragraph 18 of the Complaint.

19. Deny the allegations contained in paragraph 19 of the Complaint.
20. Deny the allegations contained in paragraph 20 of the Complaint.
21. Deny the allegations contained in paragraph 21 of the Complaint.
22. Repeat paragraphs 1 through 21 of this Answer in response to paragraph 22 of the Complaint.
23. Deny the allegations contained in paragraph 23 of the Complaint.
24. Deny the allegations contained in paragraph 24 of the Complaint.
25. Repeat paragraphs 1 through 24 of this Answer in response paragraph 25 of the Complaint.
26. Deny the allegations contained in paragraph 26 of the Complaint.
27. Deny the allegations contained in paragraph 27 of the Complaint.
28. Deny the allegations contained in paragraph 28 of the Complaint.
29. Deny the allegations contained in paragraph 29 of the Complaint.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE**

30. The Complaint fails to state a cause of action upon which relief can be granted.

#### **SECOND AFFIRMATIVE DEFENSE**

31. The claims in the Complaint are barred by the doctrine of laches.

#### **THIRD AFFIRMATIVE DEFENSE**

32. The claims in the Complaint are barred by the doctrine of unclean hands.

#### **FOURTH AFFIRMATIVE DEFENSE**

33. Any cause of action in the Complaint has been waived in whole or in part, and, to the extent waived, is barred

#### **JURY TRIAL DEMAND**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Defendants demand trial by jury in this action of all claims and issues triable by jury.

WHEREFORE, defendants Tamarind Grove, Lakshmi Pratury, Shyamoli Banerjee and Anu Sethuram demand judgment against plaintiff TamarindArt dismissing the Complaint against them, along with interest, costs and attorneys' fees and such other and further relief as to the Court seems just and proper.

Dated: New York, New York  
September 6, 2007

FREIDBERG COHEN  
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/s/  
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Shyamoli Banerjee and Anu Sethuram